

EXHIBIT

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IN THE FEDERAL COURT OF
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CIVIL ACTION NUMBER

2:06CV 377-WKW

PIONEER SERVICES, INC.,

Plaintiff,

vs.

AUTO OWNERS INSURANCE

COMPANY,

Defendant.

VIDEOTAPE DEPOSITION TESTIMONY OF:

BILL REAVES

January 25, 2007

10 a.m.

COURT REPORTER:

APRIL R. BENDINGER, CSR

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1 Q. Property damage claim.

2 A. What kind of property damage?

3 Q. Give me an example, and I'll pick
4 one. I don't know what your classifications
5 are.

6 A. Fire.

7 Q. Well, we've talked about
8 electrical and lightning. What about a
9 lightning damage claim? What correspondence
10 would be sent from Auto Owners to the insured,
11 or from you to the insured on a claim like that?

12 A. May send out a proof of loss,
13 personal property inventory forms, a letter may
14 go out requesting estimates for the damage.

15 Q. Is that a form letter?

16 A. Yes, it is.

17 Q. Is that the request for the
18 inventory or a request for the estimates? What
19 did you say it is?

20 A. Both.

21 Q. Both. Other than the proof of
22 loss and the inventory forms and the request for
23 inventory and the request for estimates, which

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1 A. That's correct.

2 Q. And that helps you decide if it
3 was a covered loss?

4 A. Mainly, he just determines if it's
5 an arson claim, if it's a set fire.

6 Q. Okay. Like you were talking about
7 earlier, those longer arson investigations?

8 A. Right.

9 Q. He helps you with those?

10 A. If it's a set fire or if it's
11 accidental in nature.

12 Q. What kind of claims does he help
13 you with besides lightning damage claims and
14 arson or fire claims?

15 A. That's the only ones that I've
16 used him for.

17 Q. Of the three to four per year, how
18 many of those are lightning claims?

19 A. I don't think I've ever used him
20 but maybe once or twice for lightning.

21 Q. Do you know if Pioneer Services
22 has ever submitted a lightning affidavit for any
23 of your insureds that you were handling claims

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1 over?

2 A. They have.

3 Q. They have? Do you know who they
4 were, the insureds?

5 A. I don't recall.

6 Q. How many times has Pioneer
7 Services submitted lightning affidavits?

8 A. I don't know the exact number.

9 Q. More than ten?

10 A. I would say less than ten times.

11 Q. More than five?

12 A. Probably somewhere between four
13 and eight.

14 Q. Okay. Do you recall the time that
15 you used them for that -- or that they submitted
16 those affidavits? Was it before or after the
17 claim that we're here about today?

18 A. I don't recall any before.

19 Q. You don't recall any before?

20 A. No.

21 Q. So the four to eight would have
22 been after?

23 A. I think so.

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1 Q. All right. Do you know how
2 Pioneer Services got involved in those claims?
3 Did you call them or did the insureds call
4 them? How did that happen?

5 A. I think the insureds called them.

6 Q. Did you have any problems with the
7 affidavits they submitted?

8 A. No, I didn't.

9 Q. Did you pay those claims?

10 MR. PEARSON: Object to the form.

11 A. I don't recall whether they were
12 paid or not.

13 Q. Were they lightning damage claims?

14 A. That's what they were turned in
15 as.

16 Q. Do you recall ever questioning any
17 of the Pioneer Services' lightning affidavits as
18 being too vague?

19 A. I don't think they were
20 questioned.

21 Q. When you say weren't questioned,
22 under any of the three criteria that we
23 discussed earlier -- being too vague, not

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1 detailed enough on the damage or doesn't list
2 the reasons they think the lightning damage was
3 the cause -- they were never questioned as to
4 any of those three potential deficiencies?

5 MR. PEARSON: Object to the form.

6 A. No.

7 Q. So would it be fair to say that
8 between four to eight times after Hurricane
9 Ivan, Auto Owners accepted lightning affidavits
10 from Pioneer Services for its insureds?

11 A. That's correct.

12 MR. PEARSON: Object to the form.

13 Q. And paid claims based on those
14 lightning affidavits?

15 MR. PEARSON: Object to the form.

16 A. I don't know if the claims were
17 paid or not.

18 Q. Do you recall denying any of those
19 claims?

20 A. I don't recall paying or denying
21 any of them.

22 Q. Do you have a list of approved
23 individuals or companies who can give lightning

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1 Q. All right. At the end of it, what
2 does it say?

3 A. Do you want me to read the last
4 page?

5 Q. Please.

6 A. It says: Belonging to Pioneer
7 Telephone Services, Incorporated. I further
8 certify that to the best of my knowledge the
9 above described property was damaged by water
10 because of damage done to the printed circuit
11 boards in the above equipment. And it's signed
12 Jimmy Williamson, James H. Williamson.

13 Q. So regardless of what the title of
14 the first page was, the certification at the
15 end -- does that make that an affidavit of water
16 damage?

17 A. That's what he's claiming.

18 Q. That's what he's trying to do,
19 isn't he?

20 A. Well, he starts out by saying it's
21 a lightning affidavit, and he ends up saying
22 it's a water -- I guess a water affidavit.

23 Q. Is this the first time you noticed

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1 that it had both names on it?

2 A. Today?

3 Q. Yes, sir.

4 A. No, it's not.

5 Q. When did you first notice that?

6 A. I don't recall the date.

7 Q. Did you notice it on the 8th when
8 you first got it?

9 A. I don't think I noticed it on the
10 8th.

11 Q. Did you notice it on the 15th when
12 you talked to Jimmy Williamson about the claim?

13 A. I don't think I had noticed that
14 at that time.

15 Q. Have you ever looked at that
16 document closely to see if the numbers add up,
17 or have you ever scrutinized it in any way?

18 A. Which numbers are you referring
19 to?

20 Q. Any numbers on it.

21 MR. PEARSON: Object to the form.

22 Q. Anything that you would do to try
23 to figure out if that document made sense or was

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1 complete in any way?

2 MR. PEARSON: Object to the form.

3 A. I don't know if these -- I've
4 never added the quantity up, if that's what
5 you're asking.

6 MR. HALL: That's what I'm asking.

7 Q. Have you ever done anything with
8 that document other than receive it on the 8th?

9 A. Not this particular document.

10 Q. Okay. And the affidavit that
11 you're holding and this invoice that starts Page
12 181 and 183, do they cover the same -- sorry,
13 184, do they cover the same items? Have you
14 ever compared the two to see?

15 A. I've spot checked to see if some
16 of the items matched up.

17 Q. You've spot checked to see if some
18 did?

19 A. That's correct.

20 Q. When did you do that?

21 A. I don't remember the date.

22 Q. Was it in preparation for this
23 deposition?

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1 A. The sixth picture is a picture of
2 one of these boards that he claimed was damaged.

3 Q. Now, is that at a different
4 location?

5 A. Yes, it is.

6 Q. Where was that taken?

7 A. That was taken at his residence.

8 Q. How far was his residence from his
9 office?

10 A. A mile, mile and a half.

11 Q. All right. Why did you go to his
12 residence?

13 A. That's where the contents he
14 claimed were damaged were located.

15 Q. All right. Did you then go with
16 him to his residence to look at those?

17 A. Yes, I did.

18 Q. And were they stored in a
19 building?

20 A. Yes, they were.

21 Q. Protected from the elements?

22 A. Yes, they were.

23 Q. And did he make them available for

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1 you to look at?

2 A. Yes, he did.

3 Q. Did he place any restrictions on
4 your looking at them?

5 A. No, he didn't.

6 Q. Did he give you as much time as
7 you wanted?

8 A. Yes, he did.

9 Q. Did he allow you to take pictures?

10 A. Yes.

11 Q. Did he allow you to take samples
12 if you wanted them?

13 MR. PEARSON: Object to the form.

14 A. We didn't request to take any
15 samples.

16 Q. Did he ever tell you you weren't
17 allowed to take samples?

18 A. No, he didn't.

19 Q. Did he ever indicate that it would
20 not be okay for you to take some of those?

21 A. No, he didn't.

22 Q. That picture on the top, what
23 number is that that shows the circuit boards?

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1 A. Because they were inside a box
2 wrapped in plastic.

3 Q. Did you look at any of the boards
4 to see if they had water stains on them?

5 A. Yes, I did.

6 Q. You took them out of the wrapping?

7 A. I took a couple of them out.

8 Q. What did you find?

9 A. I didn't see any damage.

10 Q. Did you take those with you?

11 A. No, I didn't.

12 Q. Was there any water stains on the
13 outside of the boxes?

14 A. Some of the boxes did have slight
15 water stains on them.

16 Q. They had water stains, though?

17 A. On some of the boxes.

18 Q. What about the next picture,
19 number -- I think that's eight?

20 A. Uh-huh, (affirmative).

21 Q. What does eight show?

22 A. That's just a pile of stuff.

23 Q. Was that all a part of this gear

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1 and equipment that he was showing you?

2 A. That's what he was claiming.

3 Q. Were you allowed access to that?

4 A. Yes, I was.

5 Q. Did you move any of those pieces
6 of equipment?

7 A. No, I didn't.

8 Q. Did you -- are there computers
9 there?

10 A. Yes, there are.

11 Q. With CPU -- the box that does all
12 the work on the computer, are they there too?

13 A. Yes, they are.

14 Q. Did you plug any of those in?

15 A. No, I didn't.

16 Q. Did you ask to take any of those
17 with you?

18 A. No, I didn't.

19 Q. What's on the next page? What's
20 number nine? That's a picture of a CPU, or a
21 computer.

22 Q. All right. I've heard it said
23 both ways. CPU, I think, stands for central

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1 processing unit, which is the box that does all
2 the work on a computer, in my mind. Is that
3 what that picture number nine is?

4 A. That's correct.

5 Q. Is number ten a picture of the
6 same unit or a different one?

7 A. I believe it's a different one.

8 Q. All right. And did you plug those
9 in to see if they would operate?

10 A. No, I didn't.

11 Q. What's number 11?

12 A. That's a photograph of something
13 he was claiming was damaged.

14 Q. All right. Is it a piece of
15 machinery, an electrical -- some kind of machine
16 that requires electricity to operate?

17 A. It appears that it's some device
18 that would require some sort of electricity to
19 run it.

20 Q. Did you ask him to explain what
21 that was?

22 A. No, I didn't.

23 Q. Did you ask him to correlate any

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1 of the pieces of equipment depicted in the
2 photographs you've just been through with any of
3 the equipment that was outlined in the estimates
4 you received on November 8th?

5 A. No, I didn't.

6 Q. All right. What's number 11? I'm
7 sorry. Is that 12?

8 A. 12. It's just another photograph
9 of the same stuff that was taken in photograph
10 eight.

11 Q. It was a lot of stuff, wasn't it?

12 A. It was a lot of stuff.

13 Q. What -- do we have another page?
14 What's on that page?

15 A. It's photographs of some more of
16 the boxes that he claims got wet.

17 Q. All right. And you didn't believe
18 him, did you?

19 A. No, I believe the boxes got wet.

20 Q. All right. Okay. And both of
21 those last two pictures, number 13 and 14, are
22 they the same kind of boxes, similar?

23 A. They're not the same boxes.

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1 party with experience in the field of looking at
2 electronics to see if they were damaged; is that
3 right?

4 A. That's correct.

5 Q. Did you write Mr. Williamson about
6 anything after the meeting on November 15th or
7 16th?

8 A. Yes, I did.

9 Q. Good. When did you write him
10 next?

11 A. I'd have to look at the claim to
12 see the exact date.

13 Q. Did you call him before you wrote
14 him that next time?

15 A. No, I didn't.

16 Q. Did you have any conversations
17 with him before you wrote him the next time?

18 A. No, I didn't.

19 Q. Did you call South Central Agency
20 and tell them to tell him anything for you?

21 A. No, I didn't.

22 Q. So when was the next time you had
23 any communication with Mr. Williamson?

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1 A. Anytime that he and I conversed.

2 Q. Next time y'all talked after the
3 meeting where you took those photographs we just
4 looked at?

5 A. I don't recall talking to
6 Mr. Williamson after that day.

7 Q. Then it would be the next time you
8 wrote him a letter, I'd suspect?

9 A. That would be the next
10 communication between the two of us.

11 Q. That's what I'm looking for. Do
12 you know if it's your December 20th letter?

13 A. Yes. Do you know what page that's
14 on?

15 Q. Not right off, but we can find it.
16 I bet Joel does. That's page what?

17 A. AO 205 and AO 206.

18 Q. All right. So you meet with him
19 and look at the equipment on November 15th or
20 16th. The pictures say 16th, you recall 15th,
21 but it was one or the other?

22 A. That's correct.

23 Q. And after that, you had no

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1 communication with him until you wrote this
2 letter on December 20, 2004; is that right?

3 A. That's correct.

4 Q. What did that letter say?

5 A. It says, Dear Sir or Madam, we
6 received the estimate from an independent
7 adjuster for your building damages. I've
8 enclosed a copy for you to review. Once you've
9 had a chance to review, please give me a call so
10 that we may settle that portion of the claim.
11 As to the damages that you're claiming to your
12 phone system due to lightning and the water
13 damage to inventory, Auto Owners appreciates
14 your professional opinion as to the damages
15 claimed; however, it is a conflict of interest
16 to write your own lighting affidavit. We also
17 understand that you have disposed of the damaged
18 equipment without us being able to have a third
19 party verify the damages. We are hereby
20 requesting you provide us with outside
21 documentation and evidence for the damage, along
22 with the salvage value. Under your policy, the
23 following is contained: Used in the event of

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1 15th or 16th, you believe that you wanted to
2 have someone test the equipment?

3 A. I was quite certain that we were
4 going to have to send somebody out to inspect
5 it.

6 Q. But you never wrote him to tell
7 him that?

8 A. I told him that while we were in
9 his shed?

10 Q. But you didn't put that in
11 writing, did you?

12 A. No, I didn't.

13 Q. When you wrote this letter on
14 December 20th, you said, we also understand that
15 you have disposed of the damaged equipment
16 without us being able to have a third party
17 verify the damages. We are hereby requesting
18 you provide us with outside documentation and
19 evidence of the damages, along with the salvage
20 value. Did Mr. Williamson ever do that?

21 A. He did send us some other
22 information.

23 Q. What did you do with that

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1 information?

2 A. Reviewed it.

3 Q. Can you find that for me in the
4 stack? Are those the estimates from Telcom?

5 A. That's correct.

6 Q. We've already marked those as a
7 separate exhibit. Just to keep us from taking
8 them out of the book, look at Page -- is 123
9 included in there?

10 A. 1 what?

11 Q. 123.

12 A. No, it's not.

13 Q. How did we pull that off? All
14 right. Is there a gap --

15 A. There's a gap from 122 to 142.

16 Q. Well, here, let me pass you over
17 something.

18 MR. PEARSON: Again, Plaintiff's
19 Exhibit 10 is what Harry brought. He knows that
20 he had all those documents --

21 MR. HALL: That's right. We're
22 going to fill in the gaps.

23 Q. Let me show you what's been marked

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1 A. I don't believe I had received
2 Telcom's --

3 Q. When you wrote this letter?

4 A. -- when I wrote that letter.

5 Q. So after the December 20th letter,
6 you got the Telcom Exhibits 3 through 7 we just
7 went through. And at the time you wrote the
8 December 20 letter, had you received the
9 financial breakdowns, the cost breakdowns that
10 you talked about from Mr. Williamson?

11 A. Yes, I had.

12 Q. So you would agree that Telcom is
13 not Pioneer Services; right?

14 A. I don't know if they are or not.

15 Q. Did you do anything to find out if
16 they were?

17 A. No, I didn't.

18 Q. So you don't know who they are or
19 anything about them; right?

20 A. Well, I told you what I had
21 learned about --

22 Q. Mac Bracewell?

23 A. -- Mac Bracewell.

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1 lightning damage to all that equipment?

2 A. No.

3 Q. Okay. So instead of believing the
4 information that was submitted to you by two
5 different people, Mr. Williamson and then Telcom
6 Services, you chose to not believe that and go
7 get a lightning strike report?

8 MR. PEARSON: Object to the form
9 and object to that characterization.

10 A. After reviewing the lightning
11 affidavit/water affidavits, they appeared to be
12 so vague -- a claim of that magnitude, to put a
13 one-line sentence in there to describe damage to
14 numerous pages of items damaged, that it seemed
15 that the information was too vague to pay a
16 claim of this size based on that limited
17 information.

18 Q. Did you ever tell that to Jimmy
19 Williamson or Mac Bracewell?

20 A. No, I didn't.

21 Q. Did you ever communicate that to
22 anybody?

23 A. No, I didn't.

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1 Q. All right. Did you ever ask Mac
2 Bracewell to explain to you the basis for his
3 opinion that the different pieces of equipment
4 had been damaged?

5 A. No. Mr. Bracewell had -- or
6 somebody had put that on the affidavit as what
7 his opinion to the damages were.

8 Q. You never asked him about that?

9 A. I never asked him about that.

10 Q. Did you ask him to explain with
11 more detail so it wasn't as vague?

12 A. No, I didn't.

13 Q. Why not?

14 A. We wanted to inspect the items in
15 the beginning because this information that we
16 were given was too vague to substantiate a claim
17 of this size.

18 Q. To this date, January 25, 2007,
19 have you or anybody from Auto Owners ever asked
20 Mr. Williamson or Mr. Bracewell to give you more
21 details about the damages to the specific pieces
22 of equipment?

23 A. No.

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1 Q. And you never told Mr. Bracewell
2 or Telcom Services or Jimmy Williamson or
3 Pioneer Services that, did you?

4 A. No, I didn't.

5 Q. You never conveyed to them that
6 after your request for more documentation from
7 an outside party and their supplying you with
8 documentation from an outside party -- which
9 they did; correct?

10 A. They supplied the information from
11 Telcom.

12 Q. Which is not Pioneer Services;
13 correct?

14 A. I don't know if it's Pioneer. I
15 can't answer if they're together or not.

16 Q. Do you have any reason to believe
17 that they're the same entity?

18 A. I don't think they are the same
19 entity.

20 Q. All right. My question to you is:
21 In your letter of December 20th, you said you
22 wanted documentation from an outside source.
23 Would you agree Exhibits 3 through 7 are

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1 documentation from an outside source concerning
2 this claim?

3 A. They are documents from an outside
4 source.

5 Q. So you received documents pursuant
6 to your request in your December 20th letter;
7 right?

8 A. That's correct.

9 Q. And you didn't do anything with
10 them, did you?

11 A. Other than review them, no.

12 Q. You never told anybody that they
13 were insufficient in some way, did you?

14 A. No, I didn't?

15 Q. You looked at them and put them in
16 the file; right?

17 MR. PEARSON: Object to the form.

18 A. They were reviewed and put in the
19 file.

20 Q. All right. Now, you listed a part
21 of the policy, Section Three, duties in the
22 event of loss, and then you put down four, five
23 and six as the subparts that you quoted. Why

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1 MR. HALL: Well, object to the
2 form.

3 MR. PEARSON: I am objecting to
4 the form. You keep characterizing --

5 MR. HALL: The Court says don't do
6 this.

7 MR. PEARSON: I'm not doing
8 anything other than --

9 MR. HALL: This is a speaking
10 objection suggesting an answer.

11 MR. PEARSON: Harry, I've been
12 through -- we're about to reach a time limit on
13 this thing.

14 MR. HALL: And I wish you would
15 stop taking the time limit.

16 MR. PEARSON: No, I haven't taken
17 up any time all day to object to the questions
18 that you've asked repeatedly making a
19 mischaracterization of something. But anyway,
20 you can go ahead and ask the question. I've
21 objected to it, and he can answer.

22 MR. HALL: Thank you.

23 Q. Back to you, Mr. Reaves. You have

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1 three subparts that are listed here. One says,
2 take reasonable steps to protect the covered
3 property. And it goes on beyond that, but
4 that's the way it starts, number four. Did he
5 do that?

6 A. Yes, he did.

7 Q. Okay. By taking it out of his
8 office at Pioneer Services and storing it in the
9 shed where you took the pictures, he complied
10 with number four, didn't he?

11 MR. PEARSON: Object to the form.

12 A. He did take the property and
13 protect it for --

14 Q. Did he do what's called for in
15 number four?

16 MR. PEARSON: Object to the form.
17 He's still answering the question, and you cut
18 him off.

19 A. Let me see number four. Yes, he
20 did.

21 Q. All right. Let's skip on to
22 five. At our request, give us complete
23 inventories of the damaged and undamaged

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1 property, including quantities, cost, values and
2 amount of loss claimed. Did he do that?

3 A. Let me see which ones he did. He
4 gave us a complete inventory of the damaged --
5 of what he claimed was damaged. Including the
6 quantities -- he included cost, but he did not
7 produce any invoices showing his cost. And he
8 did provide the value that he claimed, which may
9 or may not be the actual amount of the claim.

10 Q. All right. So under five, he gave
11 you a complete inventory, gave you the
12 quantities, he gave you the cost, because he
13 sent up those dollar values that you told me
14 about that we talked about some; right?

15 A. He gave cost. Whether they are
16 his cost or just retail cost, I don't know.

17 Q. He gave you cost?

18 A. He gave me some cost.

19 Q. Values, and the amount of the loss
20 claimed. He did all those, didn't he?

21 A. Yes.

22 Q. Number six, as often as may be
23 reasonably required, permit us to inspect the

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1 Q. And Mr. Williamson never
2 restricted your access to that equipment on that
3 visit, did he?

4 A. No.

5 Q. Did he indicate to you you could
6 never come back and look at it again?

7 A. No, he didn't.

8 Q. Did you ever write him and tell
9 him that you wanted to come back and look at it
10 again?

11 A. No, I didn't. I told him while we
12 were there that we were going to send somebody
13 to look at it.

14 Q. All right. Well, he disagrees
15 with that, and we'll talk to him tomorrow about
16 that. Other than your word that you told him on
17 November 16 that you wanted to come back and
18 look at it again or have someone come look at
19 it, is there any other evidence that supports
20 your position that you asked him to hold on to
21 the equipment?

22 A. No.

23 Q. How many inspections are required

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1 could dispose of the property?

2 A. Larry Dewberry told me that.

3 Q. Have you ever talked to Jimmy
4 Williamson about that?

5 A. No, I haven't.

6 Q. Did you ever call him to find out
7 if that was true?

8 A. No. I believe I mentioned that in
9 my December 20th letter.

10 Q. How did you mention that in your
11 December 20th letter?

12 A. Okay. I was mistaken. I did not
13 mention that in the December 20th letter.

14 Q. All right. In this letter of
15 December 21st, it says --

16 A. No, no. Let me back up. It says,
17 we also understand that you have disposed of the
18 damaged equipment without us being able to have
19 a third party verify the damages.

20 Q. But not about who told him he
21 could dispose of it?

22 A. No.

23 Q. This letter of December 21st says,

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1 it was Mr. Dewberry's understanding that the
2 insured's agent had advised him that he could
3 dispose of the property. We have not yet
4 verified that with the insured. Did you do
5 anything to find out -- to verify that with the
6 insured?

7 A. I didn't call him.

8 Q. Did you do anything to verify
9 that?

10 A. I put it in the December 20th
11 letter.

12 Q. No, you didn't. I'm asking if you
13 did anything to verify whether or not the agent
14 told Mr. Williamson he could dispose of the
15 property?

16 A. I'm sorry. Ask me again.

17 Q. We're on the last line of the
18 second paragraph of the second page: We have
19 not yet verified that with the insured. And
20 "that" being him being told by the agent he
21 could dispose of the property. Do you follow
22 me?

23 A. Okay. What is your question?

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1 Q. Did you do anything to verify that
2 with the insured?

3 A. I verified that with the agent.

4 Q. You never called the insured about
5 that, did you?

6 A. No, I didn't.

7 Q. What did the agent say?

8 A. The agent advised that Jimmy
9 Williamson had called them in a panic saying
10 that somebody wanted to come look at the
11 equipment, and he'd already thrown it away. And
12 the agent said that he was telling them that
13 they had told him he could throw it away.

14 Q. And?

15 A. The agents advised that they
16 didn't tell him he could throw it away.

17 Q. Did you ever ask Jimmy Williamson
18 whether the agents told him he could throw it
19 away?

20 A. No, I didn't.

21 Q. If the agents had told him to
22 throw it away, would that affect your decision
23 about this claim?

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1 20th letter from both Pioneer Services as well
2 as a third party, Telcom Services, didn't you?

3 A. I did.

4 Q. You chose to disregard both of
5 those and put them in the file after looking at
6 them; right?

7 A. The one from Pioneer Services was
8 disregarded because it was a conflict of
9 interest to write your own lightning affidavit.

10 Q. So when he supplied you with a
11 replacement from a third party, you disregarded
12 that one as well, didn't you?

13 A. Not totally.

14 Q. In what way did you not disregard
15 it?

16 A. It was considered before it was
17 denied.

18 Q. And then put in the file?

19 A. I mean, it was in the file.

20 Q. You looked at it and put it in the
21 file, you told me earlier?

22 A. Right.

23 Q. That's all you did with it; right?